C.   REMARKS

1.   Summary of the Claims

Claims 1-20 are currently pending in the application. Claims 1, 8, and 14 are independent claims. Claims 1, 8, and 14 have been amended. No claims have been added or cancelled. No new matter has been added. Reconsideration of the claims is respectfully requested.

2.   Examiner Interview

Applicants note with appreciation the telephonic interview conducted between Applicants' patent agent, Scott Schmok, and the Examiner on June 21, 2004. During the telephonic interview, the Examiner and Applicants' patent agent discussed the 103 reference (Stewart, et al., U.S. Publication No. 2001/0039570). In particular, Applicants' patent agent highlighted the differences between the Stewart reference and limitations included in Applicants' claim 1. Applicants' patent agent emphasized that Applicants convert an electronic document request from a first format to a second format. Applicants' patent agent pointed out that Stewart teaches the use of XML to send e-commerce messages due to XML's open message format, and, therefore, Stewart does not contemplate, let alone teach or suggest, converting a message from a first format to a second format.

Although Applicants' patent agent does not concede that the Steward reference teaches or suggests Applicants' claimed invention, Applicants' patent agent suggested amending claims 1, 8, and 14 to emphasize that Applicants' second format is different than Applicants' first format. The Examiner suggested that the Applicants' patent agent should respond to

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the Office Action, whereupon the Examiner would review the amendment and the cited art in more detail.

Applicants have made such amendments to independent claims 1, 8, and 14. While no agreement was reached regarding the claims, Applicants respectfully submit that, as explained in further detail below, the amendments made to claims 1, 8, and 14, place these claims and their respective dependent claims in condition for allowance.

3. Drawings

Applicants note that the Examiner did not indicate whether the formal drawings, filed with Applicants' application, are accepted by the Examiner. Applicants respectfully request that the Examiner indicate whether the formal drawings are accepted in the next office communication.

4. Claim Rejections 35 U.S.C. § 103, Alleged Obviousness

Claims 1-20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Publication No. 2001/0039570 to Stewart et al. (hereinafter "Stewart") in view of U.S. Publication No. 2002/0123957 to Notarius et al. (hereinafter "Notarius"). Applicants respectfully traverse these rejections.

The independent claims are directed to "processing electronic document requests" with limitations comprising:

- receiving a request from an initiator transmitted through a computer network;

- determining a target recipient;

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- identifying a first format corresponding to the request;

- identifying a second format corresponding to the target recipient, <u>wherein the second format is different than the first format</u>;

- dynamically locating a process, wherein the process is adapted to format the request from the first format to the second format;

- formatting the request using the located process;

- creating a response based on the formatting; and

- sending the formatted response to the target recipient.

Applicants have amended claim 1 to distinctly claim "*identifying a first format…identifying a second format* <u>*wherein the second format is different than the first format*</u>*… locating a process [that is] adapted to format the request from the first format to the second format… and formatting a request using the located process.*" In general, Stewart does not convert requests from one format to another format, but rather provides businesses' a single environment to communicate with each other whereby the environment allows multiple formats. Particularly, Stewart teaches the use of XML because "*XML offers tremendous advantages as a universal format for messages passed between trading partners*" (page 9, para. 0133). When a business chooses not to use XML, Stewart does not teach a message reformatting process, but rather depends on each business to manage format types between their individual business partners. Specifically, Stewart states that "*XML by itself doesn't solve the interoperability*

problem, [and] **collaborating entities must agree on the semantics of business protocols** for this information" (page 9, para. 0133, emphasis added). In other words, Stewart relies upon businesses to agree upon a particular protocol and, therefore, Stewart does not even contemplate, let alone teach, converting electronic document requests from a first format to a second format.

In addition, with respect to the fifth element of claim 1, the Office Action contends that Stewart teaches "*dynamically locating a process, wherein the process is adapted to format the request from the first format to the second format*" as claimed by Applicants. In contrast, however, upon closer inspection, Stewart states, on page 11, paragraph 0170, that "*…the workflow server process may also communicate with enterprise components using XML, RMI, and EXEC, among others.*" In other words, Stewart teaches the **acceptance** of different types of messages, but Stewart does not teach "*dynamically locating a process, wherein the process is **adapted to format the request from the first format to the second format**"* as claimed by Applicants. The Office Action does not contend that Notarius teaches such limitation, and indeed it does not.

Therefore, neither Stewart nor Notarius, taken together or separately, teach or suggest Applicants' claimed limitation of "*dynamically locating a process, wherein the process is adapted to format the request from the first format to the second format.*"

Furthermore, with respect to the sixth element of claim 1, the Office Action contends that Stewart teaches "*formatting*

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the request using the located process" as claimed by Applicants. In contrast, however, upon closer inspection, since Stewart never retrieves a process to reformat a request, Stewart never contemplates, let alone teaches, formatting the request using the located process as claimed by Applicants. Specifically, on page 18, paragraph 0349, Stewart states:

> "…the message type system is a polymoyphic hierarchy of message types. A message type is an abstraction of information that will be shared by transactors (e.g. ORDER, CUSTOMER, PRODUCT, etc.). All message types share some common behavior, such as how the encapsulated information (XML) can be manipulated. Therefore, the type system implements basic manipulation capabilities (create, read, update, delete) on the base level."

Stewart teaches using a message type system to send messages to business partners with the ability to change message information, such as "inventory status," corresponding to a particular message. Stewart does not, however, teach or suggest, in whole or in part, formatting the message from a first format to a second format, and especially does not teach or suggest, in whole or in part *"formatting the request using the located process"* as claimed by Applicants. The Office Action does not contend that Notarius teaches such limitation, and indeed it does not.

Therefore, neither Stewart nor Notarius, taken together or separately, teach or suggest Applicants' claimed limitation of *"formatting the request using the located process."* Since neither Stewart nor Notarius, taken together or separately, teach or suggest all the limitations included in Applicants' claim 1, claim 1 is in condition for allowance. Claim 8 is an information handling system claim including the same limitations of claim 1 and, therefore, is allowable for the

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same reason as claim 1.   Claim 14 is a computer program product claim including the same limitations of claim 1 and, therefore, is allowable for the same reason as claim 1.

Notwithstanding the fact that claim 4 is dependent upon claim 1 and therefore allowable for the same reasons as claim 1, claim 4 adds the limitations to claim 1 of:

- retrieving a HUB transaction process list;
- determining whether a transaction process implementation is available based upon the HUB transaction process list; and
- sending a message to the initiator based on the determination.

The Office Action contends that Stewart teaches "*retrieving a HUB transaction process list ... and determining whether a transaction process implementation is available based upon the HUB transaction list*" as claimed by Applicants. However, upon closer inspection, Stewart <u>does not</u> retrieve a HUB transaction list and, therefore, does not even contemplate, let alone teach, determining whether a transaction process implementation is available based upon a HUB transaction list.   Specifically, on page 17, paragraph 0323, Stewart states:

> "When decoding the RosettaNet message, an additional check can be made that the DUNS identifier of the sender, as retrieved from the message, matches that of the certificate.   Since the c-hub is acting as a trusted intermediary, this will validate that the sender is who is claimed before the message is passed on to the recipient.   If the match fails, the message will be rejected by the c-hub."

In other words, Stewart teaches checking a digital certificate to validate a sender, which is completely different than "*retrieving a HUB transaction process list ...*

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and determining whether a transaction process implementation
is available based upon the HUB transaction list" as claimed
by Applicants.   The Office Action does not contend that
Notarius teaches such limitation, and indeed it does not.

Therefore, neither Stewart nor Notarius, taken together
or separately, teach or suggest Applicants' claimed limitation
of "retrieving a HUB transaction process list ... and
determining whether a transaction process implementation is
available based upon the HUB transaction list." Since neither
Stewart nor Notarius, taken together or separately, teach or
suggest all the limitations included in Applicants' claim 4,
claim 4 is in condition for allowance. Claim   11   is   an
information handling system claim including the same
limitations of claim 4 and, therefore, is allowable for the
same reason as claim 4.   Claim 17 is a computer program
product claim including the same limitations of claim 4 and,
therefore, is allowable for the same reason as claim 4.

Each of the remaining claims, 2-3, 5-7, 9-10, 12-13, 15-
16, and 18-20 each depend, directly or indirectly, on one of
the allowable independent claims 1, 8, and 14. Therefore,
claims 2-3, 5-7, 9-10, 12-13, 15-16, and 18-20 are also
allowable for at least the same reasons that the respective
independent claims are allowable.

CONCLUSION

As a result of the foregoing, it is asserted by
Applicants that the amended claims in the Application are in
condition for allowance, and Applicants respectfully request
an early allowance of such claims.

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Applicants respectfully request that the Examiner contact the Applicants' attorney listed below if the Examiner believes that such a discussion would be helpful in resolving any remaining questions or issues related to this Application.

Respectfully submitted,

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